

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 05-CR-10102 JLT
)	
v.)	
)	
JOHN BRUENS, MARY STEWART,)	
MELISSA VAUGHN, and)	
MARC SIROCKMAN,)	
)	
Defendants.)	
)	

**DEFENDANTS' JOINT MOTION TO PRECLUDE
TESTIMONY BY ADAM WHITEHURST**

Defendants John Bruens, Mary Stewart, Melissa Vaughn, and Marc Sirockman (collectively, "Defendants") hereby move this Court for an Order directing that the Government is precluded from offering the testimony of Adam Whitehurst. The grounds for this motion are set forth in the accompanying Memorandum of Law in Support of Defendants' Joint Motion to Preclude Testimony by Adam Whitehurst.

Respectfully submitted,

JOHN BRUENS, MARY STEWART,
MELISSA VAUGHN, and MARC SIROCKMAN
by their undersigned attorneys:

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Dated: September 19, 2006

CERTIFICATE OF SERVICE

I hereby certify that this Joint Motion to Preclude Testimony by Adam Whitehurst and the accompanying Memorandum of Law in Support thereof, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on September 19, 2006.

/s/ Catherine B. Winter